INTERNET FORM NLRB-501

Address Silver Spring MD 20903

#### UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case	Date Filed
05-CA-274141	3/12/21

INSTRUCTIONS: File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring. 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT b. Tel. No. a. Name of Employer (615) 521-6041 Keolis Transit America c. Cell No. f. Fax No. d. Address (Street, city, state, and ZIP code) e. Employer Representative g. e-Mail 42031 Loudoun Center Pl. <sup>(b) (6), (b) (7)(C)</sup>@keolisna.com VA Leesburg 20175 h. Number of workers employed 120 i. Type of Establishment (factory, mine, wholesaler, etc.) j. Identify principal product or service Transportation Mass Transit k. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act. 2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) --See additional page--3. Full name of party filing charge (if labor organization, give full name, including local name and number) Title: Collective Bargaining Administrator Amalgamated Transit Union Local 689 4b. Tel. No. 4a. Address (Street and number, city, state, and ZIP code) (202) 826-4845 4c. Cell No. 10000 New Hampshire Avenue MD Silver Spring 20903 4d. Fax No. 4e. e-Mail jertl@atu.org 5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) AFL-CIO/CLC Tel. No. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief. (202) 826-4845 Office, if any, Cell No. Title: Collective Bargaining Administrator (signature of representative or person making charge) (Print/type name and title or office, if any) Fax No. e-Mail 10000 New Hampshire Avenue

#### WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

03/12/2021 01:14:56 PM

(date)

jertl@atu.org

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.

#### **Basis of the Charge**

#### 8(a)(3)

Within the previous six months, the Employer refused to hire an employee(s) because the employee(s) joined or supported a labor

organization and in order to discourage union activities or membership.

Name of employee refused hire	Approximate date of refusal to hire
Various	03/05/2021

#### 8(a)(1)

Within the previous six months, the Employer refused to hire an employee(s) because the employee(s) engaged in protected concerted activities by, inter alia, protesting wages, hours, or other terms and conditions of employment and in order to discourage employees from engaging in protected concerted activities.

Name of employee refused hire	Approximate date of refusal to hire
Various	03/05/2021

#### 8(a)(1)

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by maintaining work rules that prohibit employees from discussing wages, hours, or other terms or conditions of employment.

#### 8(a)(5)

Within the previous six months, the Employer failed and refused to bargain in good faith with the union as the collective bargaining representative of its employees.

INTERNET FORM NLRB-501

### UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

#### FIRST AMENDED CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case	Date Filed
05-CA-274141	3/19/21

NSTRUCTIONS:

File an original with NLRB Regional Director for the region in which th		ng.
a. Name of Employer	GAINST WHOM CHARGE IS BROUGHT	b. Tel. No.
		(615) 521-6041
Keolis Transit America		c. Cell No.
d. Address (Street, city, state, and ZIP code)	e. Employer Representative	f. Fax No.
a. Address (Street, sity, state, and 211 seasy		g. e-Mail
42031 Loudoun Center PI.	(b) (6), (b) (7)(C)	(b) (6), (b) (7)(G) @keolisna.com
VA Leesburg 20175		h. Number of workers employed
Type of Establishment (factory, mine, wholesaler, etc.)     Transportation	j. Identify principal product or service Mass Transit	- <del> </del>
k. The above-named employer has engaged in and is engaging		ction 8(a), subsections (1) and (list
subsections) 3,1,5		
practices are practices affecting commerce within the meanin within the meaning of the Act and the Postal Reorganization A	g of the Act, or these unfair labor practices are ur	or Relations Act, and these unfair labor nfair practices affecting commerce
Basis of the Charge (set forth a clear and concise statement)	of the facts constituting the alleged unfair labor p	ractices)
		,
See additional page		
3. Full name of party filing charge (if labor organization, give full		
John Ertl Title: Colle Amalgamated Transit Union Local 689	ctive Bargaining Administrator	
4a. Address (Street and number, city, state, and ZIP code)		4b. Tel. No. (202) 826-4845
40000 New Hampshire Avenue		4c. Cell No.
10000 New Hampshire Avenue MD Silver Spring 20903		
ind circle opining 20000		4d. Fax No.
		4e. e-Mail
		jertl@atu.org
<ol> <li>Full name of national or international labor organization of whorganization)</li> <li>AFL-CIO/CLC</li> </ol>	nich it is an affiliate or constituent unit (to be filled	in when charge is filed by a labor
6. DECLARATION		Tel. No.
I declare that I have read the above charge and that the statements	are true to the best of my knowledge and belief.	(202) 826-4845
T.A.	John Ertl	Office, if any, Cell No.
	Collective Bargaining Administrator	onico, ii uriy, con rio.
	Print/type name and title or office, if any)	Fax No.
10000 New Hampshire Avenue	03/18/2021 03:53:50 PM	e-Mail
Address Silver Spring MD 20903	(date)	jertl@atu.org

# WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.

#### Basis of the Charge

#### 8(a)(3)

Within the previous six months, the Employer refused to hire an employee(s) because the employee(s) joined or supported a labor

organization and in order to discourage union activities or membership.

Name of employee refused hire	Approximate date of refusal to hire
Various	03/05/2021

#### 8(a)(1)

Within the previous six months, the Employer refused to hire an employee(s) because the employee(s) engaged in protected concerted activities by, inter alia, protesting wages, hours, or other terms and conditions of employment and in order to discourage employees from engaging in protected concerted activities.

Name of employee refused hire	Approximate date of refusal to hire
Various	03/05/2021

#### 8(a)(1)

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by maintaining work rules that prohibit employees from discussing wages, hours, or other terms or conditions of employment.

#### 8(a)(1) and/or (3)

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by issuing employment offer letters to potential employees that limit their ability to plan, organize to otherwise participate in protected concerted activities and/or union activities.

#### 8(a)(5)

Within the previous six months, the Employer failed and refused to bargain in good faith with the union as the collective bargaining representative of its employees.

INTERNET FORM NLRB-501

#### UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case	Date Filed
5-CA-274784	3/26/2021

INSTRUCTIONS: File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring. 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT b. Tel. No. a. Name of Employer (615) 521-6041 Keolis Transit America c. Cell No. f. Fax No. d. Address (Street, city, state, and ZIP code) e. Employer Representative g. e-Mail 42031 Loudoun Center Pl. <sup>b) (6), (b) (7)(C)</sup>@keolisna.com VA Leesburg 20175 h. Number of workers employed 120 i. Type of Establishment (factory, mine, wholesaler, etc.) j. Identify principal product or service Transportation Mass Transit k. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act. 2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) --See additional page--3. Full name of party filing charge (if labor organization, give full name, including local name and number) Title: Collective Bargaining Administrator Amalgamated Transit Union Local 689 4b. Tel. No. 4a. Address (Street and number, city, state, and ZIP code) (202) 826-4845 4c. Cell No. 10000 New Hampshire Avenue MD Silver Spring 20903 4d. Fax No. 4e. e-Mail jertl@atu.org 5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) AFL-CIO/CLC Tel. No. 6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief. (202) 826-4845 Office, if any, Cell No. Title: Collective Bargaining Administrator (signature of representative or person making charge) (Print/type name and title or office, if any) Fax No. e-Mail 10000 New Hampshire Avenue 03/26/2021 05:23:57 PM jertl@atu.org Address Silver Spring MD 20903

#### WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

(date)

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.

#### Basis of the Charge

#### 8(a)(3)

Within the previous six months, the Employer refused to hire an employee(s) because the employee(s) joined or supported a labor

organization and in order to discourage union activities or membership.

Name of employee refused hire	Approximate date of refusal to hire	
(b) (6), (b) (7)(C	(b) (6), (b) (7)(C)	
Various	03/26/2021	

#### 8(a)(1)

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights

protected by Section 7 of the Act by threatening to retaliate against employees if they joined or supported a union.

Name of Employer's Agent/Representative who made the statement	Approximate date
(b) (6), (b) (7)(C)	03/24/2021
(b) (6), (b) (7)(C)	03/25/2021

#### 8(a)(1)

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights

protected by Section 7 of the Act by interrogating employees about their union activities.

Name of Employer's Agent/Representative who made the statement	Approximate date
(b) (6), (b) (7)(C)	01/16/2021

#### 8(a)(1)

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by maintaining work rules that prevent or discourage employees from engaging in protected concerted activities.

Work Rule
Prohibition on soliciting other employees
binding arbitration agreements

#### 8(a)(5)

Within the previous six months, the Employer failed and refused to recognize the union as the collective bargaining representative of its employees.

#### 8(a)(5)

Within the previous six months, the Employer failed and refused to bargain in good faith with the union as the collective bargaining representative of its employees.

#### 8(a)(5)

Within the previous six months, the Employer failed and refused to bargain in good faith with the union as the collective bargaining representative of its employees by making unilateral changes in terms and conditions of employment.

List Changes	Approximate date of change
imposed lower medical premium costsharing	03/04/2021
imposed changes to flex time system	03/04/2021
changed health insurance provider	03/04/2021
removed Labor Day as a paid holiday	03/04/2021

#### 8(a)(5)

Within the previous six months, the Employer failed and refused to bargain in good faith with the union as the collective bargaining

representative of its employees by failing to furnish information requested by the union.

Date of request	Employer representative	List items requested	Date refused
03/09/2021	(b) (6), (b) (7)(C)	Healthcare premium information	03/16/2021
03/19/2021	(b) (6), (b) (7)(C)	Various	03/20/2021

FORM EXEMPT UNDER 44 U.S.C 3512

INTERNET FORM NLRB-501

#### UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD **CHARGE AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE		
Case	Date Filed	
05-CA-274784	8/19/21	

Tol No

#### INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring. 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT b. Tel. No. a. Name of Employer (615) 521-6041 **Keolis Transit America** c. Cell No. f. Fax No. d. Address (Street, city, state, and ZIP code) e. Employer Representative g. e-Mail 42031 Loudoun Center Pl. ) (6), (0) (7)(C) @keolisna.com VA Leesburg 20175 h. Number of workers employed 120 i. Type of Establishment (factory, mine, wholesaler, etc.) j. Identify principal product or service Transportation Mass Transit k. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act. 2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) --See additional page--

3. Full name of party filing charge (if labor organization,	give full name, including local name and number)	
John Ertl Title Amalgamated Transit Union Local 689	e: Collective Bargaining Administrator	
4a. Address (Street and number, city, state, and ZIP cod	(e)	4b. Tel. No. (202) 826-4845
10000 New Hampshire Avenue		4c. Cell No.
MD Silver Spring 20903		4d. Fax No.
		4e. e-Mail
		jertl@atu.org
Full name of national or international labor organization     AFL-CIO/CLC	on of which it is an affiliate or constituent unit (to be filled	in when charge is filed by a labor

DECLARATION  I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.		Tel. No.
		(202) 826-4845
By	John Ertl Title: Collective Bargaining Administrator	Office, if any, Cell No.
(signature of representative or person making charge)	(Print/type name and title or office, if any)	Fax No.
40000 M		e-Mail
10000 New Hampshire Avenue Address Silver Spring MD 20903	(date)	jertl@atu.org

#### WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

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#### Basis of the Charge

#### 8(a)(3)

Within the previous six months, the Employer refused to hire an employee(s) because the employee(s) joined or supported a labor

organization and in order to discourage union activities or membership.

Name of employee refused hire	Approximate date of refusal to hire
(b) (6), (b) (7)(C	(b) (6), (b) (7)(C)
Various	03/26/2021

#### 8(a)(1)

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights

protected by Section 7 of the Act by threatening to retaliate against employees if they joined or supported a union.

Name of Employer's Agent/Representative who made the statement	Approximate date
(b) (6), (b) (7)(C)	03/12/2021
(b) (6), (b) (7)(C) or any other Employer agent who issued the	03/25/21

March 25, 2021 memo threatening employees with termination if they struck.

#### 8(a)(1)

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights

protected by Section 7 of the Act by interrogating employees about their union activities.

Name of Employer's Agent/Representative who made the statement	Approximate date
(b) (6), (b) (7)(C)	01/16/2021

#### 8(a)(1)

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by maintaining work rules that prevent or discourage employees from engaging in protected concerted activities.

Work Rule
Prohibition on soliciting other employees
binding arbitration agreements

#### 8(a)(5)

Within the previous six months, the Employer failed and refused to recognize the union as the collective bargaining representative of its employees.

#### 8(a)(5)

Within the previous six months, the Employer failed and refused to bargain in good faith with the union as the collective bargaining representative of its employees.

#### 8(a)(5)

Within the previous six months, the Employer failed and refused to bargain in good faith with the union as the collective bargaining representative of its employees by making unilateral changes in terms and conditions of employment.

List Changes	Approximate date of change
imposed lower medical premium costsharing	03/04/2021
imposed changes to flex time system	03/04/2021
changed health insurance provider	03/04/2021
removed Labor Day as a paid holiday	03/04/2021

#### 8(a)(5)

Within the previous six months, the Employer failed and refused to bargain in good faith with the union as the collective bargaining representative of its employees by failing to furnish information requested by the union.

Date of request	Employer representative	List items requested	Date refused
03/09/2021	(b) (6), (b) (7)(C)	Healthcare premium information	03/16/2021
03/19/2021	(b) (6), (b) (7)(C)	Various	03/20/2021

INTERNET FORM NLRB-501 (2-08)

# UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD CHARGE AGAINST EMPLOYER

# DO NOT WRITE IN THIS SPACE Case Date Filed 05-CA-275253 4/6/21

INSTRUCTIONS

File an original with NLRB Regional Director for the region in which th		ng.	
	GAINST WHOM CHARGE IS BROUGHT	h Tal Na	
a. Name of Employer		b. Tel. No. (615) 521-6041	
Keolis Transit America			
		c. Cell No.	
		f Fow No	
d. Address (Street, city, state, and ZIP code)	e. Employer Representative	f. Fax No.	
u. Address (Street, Sity, State, and Zii Code)	o. Employof Representative	g. e-Mail	
42031 Loudoun Center PI.	(b) (6), (b) (7)(C)	(D)(6).(D)(7)(C) @keolisna.com	
VA Leesburg 20175			
		h. Number of workers employed	
		120	
i. Type of Establishment (factory, mine, wholesaler, etc.)	j. Identify principal product or service		
Transportation Mass Transit			
k. The above-named employer has engaged in and is engaging	in unfair labor practices within the meaning of sec	tion 8(a), subsections (1) and (list	
subsections) 5 of the National Labor Relations Act, and these unfair labor			
practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce			
within the meaning of the Act and the Postal Reorganization		p	
Basis of the Charge (set forth a clear and concise statement		acticos)	
2. Dasis of the Charge (set forth a deal and condise statement	or the facts constituting the alleged diffall fabor pr	actices)	
See additional page			
See additional page			
3. Full name of party filing charge (if labor organization, give full	name, including local name and number)		
	ctive Bargaining Administrator		
Amalgamated Transit Union			
4a. Address (Street and number, city, state, and ZIP code)		4b. Tel. No.	
		(202) 826-4845	
10000 New Hampshire Avenue		4c. Cell No.	
MD Silver Spring 20903		41.5	
· ·		4d. Fax No.	
		4e e-Mail	
		4e. e-Mail	
		jertl@atu.org	
5. Full name of national or international labor organization of whether the state of the state o	nich it is an affiliate or constituent unit (to be filled	jertl@atu.org	
organization)	nich it is an affiliate or constituent unit (to be filled	jertl@atu.org	
	nich it is an affiliate or constituent unit (to be filled	jertl@atu.org in when charge is filed by a labor	
organization) AFL-CIO/CLC  6. DECLARATION	·	jertl@atu.org	
organization) AFL-CIO/CLC	·	jertl@atu.org in when charge is filed by a labor	
organization) AFL-CIO/CLC  6. DECLARATION	are true to the best of my knowledge and belief.	jertl@atu.org in when charge is filed by a labor Tel. No. (202) 826-4845	
organization) AFL-CIO/CLC  6. DECLARATION I declare that I have read the above charge and that the statements	·	jertl@atu.org in when charge is filed by a labor Tel. No.	
organization) AFL-CIO/CLC  6. DECLARATION I declare that I have read the above charge and that the statements  By  Title:	are true to the best of my knowledge and belief.  John Ertl	jertl@atu.org  in when charge is filed by a labor  Tel. No.  (202) 826-4845  Office, if any, Cell No.	
organization) AFL-CIO/CLC  6. DECLARATION I declare that I have read the above charge and that the statements  By  Title:	are true to the best of my knowledge and belief.  John Ertl  Collective Bargaining Administrator	jertl@atu.org in when charge is filed by a labor Tel. No. (202) 826-4845	
organization) AFL-CIO/CLC  6. DECLARATION I declare that I have read the above charge and that the statements  By (signature of representative or person making charge)	are true to the best of my knowledge and belief.  John Ertl  Collective Bargaining Administrator	jertl@atu.org  in when charge is filed by a labor  Tel. No.  (202) 826-4845  Office, if any, Cell No.	
organization) AFL-CIO/CLC  6. DECLARATION I declare that I have read the above charge and that the statements  By  Title:	are true to the best of my knowledge and belief.  John Ertl  Collective Bargaining Administrator	jertl@atu.org  in when charge is filed by a labor  Tel. No.  (202) 826-4845  Office, if any, Cell No.  Fax No.	

## WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

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### **Basis of the Charge**

#### 8(a)(5)

Within the previous six months, the Employer failed and refused to bargain in good faith with the union as the collective bargaining

representative of its employees by making unilateral changes in terms and conditions of employment.

List Changes	Approximate date of change
Denying union access to the facility	04/06/2021

FORM NLRB-502 (RM) (2-18)

14a, Name and Title:

ALM

JEFF RAINEY

Name (Print)

JEFF RAINEY DIRECTOR, HR

515) 521-6041

I declare that I have read the above petition and that the statements are true to the best of my knowledge and belief.

# UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD RM PETITION

DO NOT WRITE IN TH	IIS SPACE
Case No.	Date Filed
05-RM-275681	04-15-2021

INSTRUCTIONS: Unless e-Filed using the Agency's website, www.nirb.gov/ submit an original of this Petition to an NLRB Office in the Region in which the employer concerned is located. The petition must be accompanied by a certificate of service showing service on all parties named in the petition of the following: (1) the petition; (2) Statement of Position form; and (3) Description of Procedures in Certification and Decertification Cases (Form NLRB 4812). The petition must also be accompanied by evidence supporting the statement that a labor organization has made a demand for recognition on the employer or that the employer has good faith uncertainty about majority support for an existing representative. However, if the evidence reveals the names and/or number of employees who no longer wish to be represented, the evidence shall not be served on any party. 1, PURPOSE OF THIS PETITION: RM-CERTIFICATION OF REPRESENTATIVE - One or more individuals or labor organizations have presented a claim to the Employer/Petitioner to be recognized as the representative of employees of the Employer/Petitioner or the Employer/Petitioner has a good faith uncertainty about majority support for an existing representative. If a charge under Section 8(b)(7) of the Act has been filed involving the Employer/Petitioner named in this petition, this statement shall not be deemed made. The Petitioner alleges that the following circumstances exist and requests that the National Labor Relations Board proceed under its proper authority pursuant to Section 9 of the National Labor Relations Act. 2b. Address(es) of Establishment(s) involved (Street and number, City, State, ZIP code): 2a. Name of Employer/Petitioner: 42031 LOUDOUN CENTER PLACE, LEESBURGI VA 20175 KEOLIS TRANSIT SERVICES, LLC 3a. Employer/Petitioner Representative - Name and Title: 3b. Address (if same as 2b - state same): SAME JEFF PAINEY, DIRECTOR, HP 3e Fax No. 3d. Cell No. (61.5) 521 - 6041 3c. Tel. No. JEFF. PAINEY @ KEOLISNA. COM NIA NIA 4b. Principal Product or Service 4a. Type of Establishment (Factory, mine, wholesaler, etc.) MASS TRANSIT TRANSPORTATION 5b. City and State where unit is located: 5a. Description of Unit Involved: DRIVERS JOPERATORS, DISPARHERS, ROLD SUPERVISORS, MAINTENANCE FOREMAN MECHANIC, UTILITY WORKERS, AND PARTS CLERKS. EESBURG, VA 6. Number of Employees in Unit: ALL OTHER EMPLOYEES, OFFICE CLERICALS, GUARDS AND SUPERVISORS AS REFINED INTHE ACT. Unless a charge alleging a violation of Section 8(b)(7) is pending, check EITHER item 7a or 7b, whichever is applicable 7a. A labor organization made a demand for recognition on the Employer/Petitioner on (Date) 3 2 3 2 2 2 7b. The Employer/Petitioner has a good faith uncertainty about majority support for an existing representative. 8b. Affiliation, if any: 8a. Name of Recognized or Certified Bargaining Agent - Name NA Be Cell No. 8d Tel No. 8c. Address: 8f. Fax No. 8g. E-Mail Address 10. Expiration Date of Current or Most 9. Date of Recognition or Certification Recent Contract, if any (Month, Day, Year) NIA 11. Is there now a strike or picketing at the Employer's establishment(s) involved? N D 🔻 If so, approximately how many employees are participating? , has picketed the Employer since (Month, Day, Year) (Name of Labor Organization) 12. Organizations or individuals other than those named in item 8, which have a contract with the Employer/Petitioner or represent employees of the Employer/Petitioner or demanded recognition as representatives and other organization and individuals known to have a representative interest in any employees in the unit described in item 5 above. (if none, so state) AMALGAMATED TRANSIT UNION LOCAL 689 12d. Cell No. 12c. Tel. No. 12a. Name and affiliation if any 10000 NEW HAMPSHIRE AVE (202) 826 - 4845 SIL VER SPRING MD 20903 128. Fax No. 1 JOHN ERTL. JERTL® ATU.ORG COLLECTIVE BARGAINING ADMINISTRATOR 13. Election Details: If the NLRB conducts and election in this matter, state your position with respect to any such election: 13a. Election Type: Manual Mail Mixed Manual/Mail 13d. Election Location(s) A T 42031 LOLDOWN CENTER PLACE 13b. Election Date(s): 13c Election Time(s): ba.m. to 8a.m. and Ip.m to. 4pm who will accept service of all papers for purposes of the representation MAY 21, 202 1

14. Representative of the Employer/Petitioner

WILLFUL FALSE STATEMENTS ON THIS PETITION CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT

14e. Fax No

NIA

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

14b. Address (street and number, city, State and ZIP code);

42031 LOUDOUN CENTER PLACE, LEESBURG, VA 20175

JEFF, RAINEY @ KEOLISNA. COM

DIRECTOR OF HOMAN RESOLUTES 4/9/2023

14f. E-Mail Address

# UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD CHARGE AGAINST EMPLOYER

	DO NOT WRITE IN THIS	SPACE
Case		Date Filed
	05-CA-282758	9/9/21

#### INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.			
1. EMPL	OYER AGAINST WHOM CHARGE IS BROUGHT		
a. Name of Employer Keolis Transit Services, LLC		b. Tel. No. (615) 521-6041	
		c. Cell No.	
		f. Fax. No.	
d. Address (Street, city, state, and ZIP code) 42031 Loudoun Center Place, Leesburg VA 20175	(b) (6), (b) (7)(C)	(b) (6), (b) (7)(C) @keolisna.com	
		h. Number of workers employed 120	
i. Type of Establishment (factory, mine, wholesaler, etc.) Transportation Garage	j. Identify principal product or service Public Transportation		
The above-named employer has engaged in and is engaged	ging in unfair labor practices within the meaning of section	8(a), subsections (1) and	
(list subsections) (5)	of the National Labor R	elations Act, and these unfair labor	
practices are practices affecting commerce within the mea	aning of the Act, or these unfair labor practices are practic	es affecting commerce within the	
meaning of the Act and the Postal Reorganization Act.			
	ment of the facts constituting the alleged unfair labor prac	tices)	
See attachment.			
0.5.11			
3. Full name of party filing charge (if labor organization, give full name, including local name and number) Amalgamated Transit Union Local 689			
4a. Address (Street and number, city, state, and ZIP code 2701 Whitney Place	2)	4b. Tel. No. (301) 669-8620	
Forestville, MD 20747-3457		4c. Cell No.	
		4d. Fax No.	
		(301) 568-0692	
		4e. e-mail rjackson@atu689.org	
5. Full name of national or international labor organization	n of which it is an affiliate or constituent unit (to be filled in w	when charge is filed by a labor organization)	
Amalgamated Transit Union, AFL-CIO/CLC	·	,	
6 DECL	ARATION	Tel. No.	
I declare that I have read the abo	ve charge and that the statements by knowledge and belief.		
/s/Christopher Bangs	Christopher Bangs, ATU Assoc Gen Counsel	Office, if any, Cell No. (202) 262-2630	
(signature of representative or person making charge)	(Print/type name and title or office, if any)	Fax No.	
Address 10000 New Hampshire Ave, Silver Sprin	g MD 20903 Date Sep 9, 2021	e-mail	
		cbangs@atu.org	

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

#### 2. Basis of the Charge

- 1. Since around April 1, 2021, the Employer has violated Sections 8(a)(5) and (1) of the Act by unilaterally changing terms and conditions of employment without giving the Union notice and while refusing to bargain, by unilaterally
  - Eliminating the weekly pay guarantee.
  - Changing the scheduling process.
  - Changing retirement benefits.

#### UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD **CHARGE AGAINST EMPLOYER**

	DO NOT WRITE IN	THIS SPACE
Case		Date Filed
	05-CA-283936	10/1/21

#### INSTRUCTIONS:

File an original with NLRB Regional Director for the region in	·	ng.
	OYER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Employer Keolis Transit Services, LLC		b. Tel. No. (615) 521-6041
		c. Cell No.
Address (Observation and 710 ands)	I	f. Fax. No.
d. Address (Street, city, state, and ZIP code) 42031 Loudoun Center Place, Leesburg VA 20175	(b) (6), (b) (7)(C)	(b) (6), (b) (7)(C) @keolisna.com
		h. Number of workers employed 120
i. Type of Establishment (factory, mine, wholesaler, etc.) Transportation Garage	j. Identify principal product or service Public Transportation	
The above-named employer has engaged in and is engaged	ging in unfair labor practices within the meaning of section	8(a), subsections (1) and
(list subsections) (5)	of the National Labor R	Relations Act, and these unfair labor
practices are practices affecting commerce within the mea	aning of the Act, or these unfair labor practices are practic	es affecting commerce within the
meaning of the Act and the Postal Reorganization Act.		
Basis of the Charge (set forth a clear and concise state See attachment.      Basis of the Charge (set forth a clear and concise state See attachment.      See attachment.  3. Full name of party filing charge (if labor organization, gramalgamated Transit Union Local 689)		aces)
		45 Tel No
4a. Address (Street and number, city, state, and ZIP code 2701 Whitney Place	<i>9</i>	4b. Tel. No. (301) 669-8620
Forestville, MD 20747-3457		4c. Cell No.
		4d. Fax No. (301) 568-0692
		4e. e-mail rjackson@atu689.org
5. Full name of national or international labor organization Amalgamated Transit Union, AFL-CIO/CLC	n of which it is an affiliate or constituent unit (to be filled in v	when charge is filed by a labor organization)
I declare that I have read the abo	ARATION ve charge and that the statements by knowledge and belief.	Tel. No.
/s/Christopher Bangs	Christopher Bangs, ATU Assoc Gen Counsel	Office, if any, Cell No. (202) 262-2630
(signature of representative or person making charge)	(Print/type name and title or office, if any)	Fax No.
Address 10000 New Hampshire Ave, Silver Spring	g MD 20903 Date Oct 1, 2021	e-mail cbangs@atu.org

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary, however, failure to supply the information may cause the NLRB to decline to invoke its processes.

- 1. On or around June 4, 2021, the Employer violated Sections 8(a)(5) and (1) of the Act by unilaterally changing terms and conditions of employment without giving the Union notice and an opportunity to bargain by unilaterally developing and implementing a new run cut procedure.
- 2. On or around June 4 and June 7, 2021, the Employer violated Sections 8(a)(5) and (1) of the Act by unilaterally changing terms and conditions of employment without giving the Union notice and an opportunity to bargain by unilaterally developing and promulgating a new Tardiness & Attendance Policy effective June 1, 2021.
- 3. Since around June 9, 2021, the Employer has violated Sections 8(a)(5) and (1) of the Act by unilaterally changing terms and conditions of employment without giving the Union notice and an opportunity to bargain by unilaterally cutting retirement benefits and by announcing that the 401(k) plan would not be set up until at least September 2021.
- 4. On or around July 15, 2021, the Employer announced to employees that it was seeking volunteers to transfer from the Commuter Operation to the Fixed Route Operation, with a reduction in wages to the lower non-bargained wage rate, and that if it did not receive enough volunteers it would unilaterally implement a "reduction in force . . . using a hold down process." By unilaterally implementing this policy without providing the Union notice and an opportunity for decisional and impact bargaining, the Employer has violated Sections 8(a)(5) and (1) of the Act.
- 5. In or around July 2021, the Employer violated Sections 8(a)(5) and (1) of the Act by a) unilaterally changing terms and conditions of employment without giving the Union notice and an opportunity to bargain, and b) direct dealing, by temporarily assigning at least two represented employees to the Employer's facility in Reno, Nevada to train strike-breakers in preparation for a strike against the Employer, which involved negotiating directly with the unit employees about their terms of employment in such an assignment and unilaterally modifying their terms and conditions of employment during the assignment.

# UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS	SPACE
Case	Date Filed
05-CA-285523	10/29/2021

#### INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT  Reolis Transit Services, LLC    Colis Transit Services, LLC
(615) 521-6041  c. Cell No.  d. Address (Street, city, state, and ZIP code) 42031 Loudoun Center Place, Leesburg VA 20175  (b) (c) (b) (c) (c)  Employer Representative (b) (6) (b) (c) (c)  L. Type of Establishment (factory, mine, wholesaler, etc.) Transportation Garage  i. Type of Establishment (factory, mine, wholesaler, etc.) Transportation Garage  j. Identify principal product or service Public Transportation  The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (5)  of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.  2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)  See attachment.  3. Full name of party filing charge (if labor organization, give full name, including local name and number) Amalgamated Transit Union Local 689  4a. Address (Street and number, city, state, and ZIP code)
d. Address (Street, city, state, and ZIP code) 42031 Loudoun Center Place, Leesburg VA 20175    Lagrange of Establishment (factory, mine, wholesaler, etc.)   Identify principal product or service Public Transportation Garage  The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.  2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)  3. Full name of party filing charge (if labor organization, give full name, including local name and number) Amalgamated Transit Union Local 689  4a. Address (Street and number, city, state, and ZIP code)
d. Address (Street, city, state, and ZIP code) 42031 Loudoun Center Place, Leesburg VA 20175  i. Type of Establishment (factory, mine, wholesaler, etc.) i. Holding product or service Transportation Garage  The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (5) practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act. 2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)  See attachment.  3. Full name of party filing charge (if labor organization, give full name, including local name and number) Amalgamated Transit Union Local 689  4a. Address (Street and number, city, state, and ZIP code)
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4a. Address (Street and number, city, state, and ZIP code)  4b. Tel. No.
4a. Address (Street and number, city, state, and ZIP code) 4b. Tel. No. (301) 669-8620
2701 Whitney Place   (301) 669-8620
Forestville, MD 20747-3457  4c. Cell No.
4d. Fax No.
(301) 568-0692
4e. e-mail
rjackson@atu689.org
1, 0
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)
Amalgamated Transit Union, AFL-CIO/CLC
6 DECLARATION Tel. No.
6. DECLARATION 1 el. No. I declare that I have read the above charge and that the statements
are true to the best of my knowledge and belief
/s/Christopher Bangs Christopher Bangs, ATU Assoc Gen Counsel Office, if any, Cell No. (202) 262-2630
(signature of representative or person making charge) (Print/type name and title or office, if any) Fax No.
(signature of representative or person making charge) (Print/type name and title or office, if any) Fax No.
(signature of representative or person making charge) (Print/type name and title or office, if any)  Fax No.  Address 10000 New Hampshire Ave, Silver Spring MD 20903  Date Oct 29, 2021  e-mail changs@atu.org

### WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

- 1. On or around October 21, 2021, the Employer violated Sections 8(a)(5) and (1) of the Act by unilaterally removing all materials from the ATU bulletin board.
- 2. On or around September 30, 2021, the Employer violated Sections 8(a)(5) and (1) of the Act by unilaterally changing terms and conditions of employment by administering a drug test to a bargaining unit member at the end of (b) shift, thereby unilaterally extending (b) working hours despite (b) need to leave at the end of (b) scheduled shift, and disciplining (b) and threatening (c) for expressing that (b) had other obligations that (b) would be late for if (b) stayed past (b) scheduled shift.
- 3. Since October 1, 2021, the Employer violated Sections 8(a)(5) and (1) of the Act by continuing to fail to set up a retirement plan for employees, despite its commitment that "the plan is to have the programming set up and tested and be ready for the Loudoun Hourly employees to enroll by September."
- 4. On or around October 21, 2021, the Employer by and through (b) (6), (b) (7)(C) (b) (6), (b) , violated Section 8(a)(1) of the Act by coercively interrogating (b) (6), (b) (7)(C) regarding Section 7 activities.
- 5. On or around October 20, 2021, the Employer violated Sections 8(a)(5) and (1) of the Act by announcing that shifts would now just be assigned and not selected through a seniority-based bidding process for employees including road supervisors.

#### UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS	SPACE
	Date Filed 04/04/2022

#### INSTRUCTIONS:

File an original with NLRB Regional Director for the region in	·	ng.
	OYER AGAINST WHOM CHARGE IS BROUGHT	1 T 1 N
a. Name of Employer Keolis Transit Services, LLC		b. Tel. No. (615) 521-6041
		c. Cell No.
Address (Otrack attached and 710 ands)		f. Fax. No.
d. Address (Street, city, state, and ZIP code) 42031 Loudoun Center Place, Leesburg VA 20175	(b) (6), (b) (7)(C)	(b) (6), (b) (7)(C) @keolisna.com
		h. Number of workers employed 120
i. Type of Establishment (factory, mine, wholesaler, etc.) Transportation Garage	j. Identify principal product or service Public Transportation	
The above-named employer has engaged in and is engage	ging in unfair labor practices within the meaning of section	8(a), subsections (1) and
(list subsections) (5)	of the National Labor R	Relations Act, and these unfair labor
practices are practices affecting commerce within the mea	aning of the Act, or these unfair labor practices are practic	ces affecting commerce within the
meaning of the Act and the Postal Reorganization Act.		
Basis of the Charge (set forth a clear and concise state See attachment.  3. Full name of party filing charge (if labor organization, given the set of the charge).		ctices)
Amalgamated Transit Union Local 689  4a. Address (Street and number, city, state, and ZIP code		4b. Tel. No.
2701 Whitney Place	<i>(</i> )	(301) 669-8620
Forestville, MD 20747-3457		4c. Cell No.
		4d. Fax No. (301) 568-0692
		4e. e-mail rjackson@atu689.org
5. Full name of national or international labor organization	of which it is an affiliate or constituent unit (to be filled in v	when charge is filed by a labor organization)
Amalgamated Transit Union, AFL-CIO/CLC		
I declare that I have read the abo	ARATION ve charge and that the statements by knowledge and belief.	Tel. No.
/s/Christopher Bangs	Christopher Bangs, ATU Assoc Gen Counsel	Office, if any, Cell No. (202) 262-2630
(signature of representative or person making charge)	(Print/type name and title or office, if any)	Fax No.
Address 10000 New Hampshire Ave, Silver Sprin	g MD 20903 Date Apr 4, 2022	e-mail cbangs@atu.org

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary, however, failure to supply the information may cause the NLRB to decline to invoke its processes.

- 1. On April 1 and April 3, 2022, the Employer through (b) (6), (b) (7)(C) violated Sections 8(a)(5) and (1) of the Act by refusing to respond to an information request the Union made on April 1, 2022, regarding discipline of a bargaining unit employee.
- 2. On April 1 and April 3, 2022, the Employer through (b) (6), (b) (7)(C) violated Sections 8(a)(5) and (1) of the Act by refusing to bargain with the Union on request regarding discipline for bargaining unit employees.

#### UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD CHARGE AGAINST EMPLOYER

	DO NOT WRITE IN THIS SPACE	
Case		Date Filed
	05-CA-305279	10/6/22

#### INSTRUCTIONS:

File an original with NLRB Regional Director for the region in		ıg.
	OYER AGAINST WHOM CHARGE IS BROUGHT	T. =
a. Name of Employer Keolis Transit Services, LLC		b. Tel. No. (310) 703-2226
		c. Cell No.
d. Address (Street, city, state, and ZIP code)	a Employer Penresentative	f. Fax. No.
42031 Loudoun Center Place, Leesburg VA 20175	e, Employer Representative (b) (6), (b) (7)(C)	g. e-mail (b) (6), (b) (7)(C)@KeolisNA.com
		h. Number of workers employed 120
i. Type of Establishment (factory, mine, wholesaler, etc.) Passenger Transportation	j. Identify principal product or service Public Transportation	
The above-named employer has engaged in and is engaged	ging in unfair labor practices within the meaning of section	8(a), subsections (1) and
(list subsections) (5)	of the National Labor R	elations Act, and these unfair labor
practices are practices affecting commerce within the mea	aning of the Act, or these unfair labor practices are practic	es affecting commerce within the
meaning of the Act and the Postal Reorganization Act.		
2. Basis of the Charge (set forth a clear and concise state See attachment.		tices)
3. Full name of party filing charge (if labor organization, gammalgamated Transit Union Local 689		
4a. Address (Street and number, city, state, and ZIP code 2701 Whitney Place, Forestville, MD 20747-3457	P)	4b. Tel. No. (301) 669-8620
Porestvine, 1915/20747-3437		4c. Cell No.
		4d. Fax No. (301) 568-0692
		4e. e-mail rjackson@atu689.org
5. Full name of national or international labor organization Amalgamated Transit Union, AFL-CIO/CLC	n of which it is an affiliate or constituent unit (to be filled in v	vhen charge is filed by a labor organization)
I declare that I have read the abo	ARATION ve charge and that the statements by knowledge and belief.	Tel. No.
/s/Christopher Bangs	Christopher Bangs, ATU Assoc Gen Counsel	Office, if any, Cell No. (202) 262-2630
(signature of representative or person making charge)	(Print/type name and title or office, if any)	Fax No.
Address 10000 New Hampshire Ave, Silver Sprin	g MD 20903 Date Oct 6, 2022	e-mail cbangs@atu.org

#### WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

#### 2. Basis of the Charge

- 1. Since around May 9, 2022, the Employer has violated Sections 8(a)(5) and (1) by discontinuing its regular practice of periodically having employees bid on work assignments by seniority.
- 2. Since around August 25, 2022, the Employer violated Sections 8(a)(5) and (1) by refusing to provide the Union with relevant information on request about the Employer's retirement benefits.
- 3. In the last six months, the Employer violated Sections 8(a)(5) and (1) by unilaterally changing employees' retirement benefits without giving the Union notice and an opportunity to bargain.
- 4. In the last six months, the Employer has violated Sections 8(a)(5) and (1) by hiring new employees into the unit on preferential terms of employment, including better shifts, more hours, and higher wages, without giving the Union notice and an opportunity to bargain.

#### UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

FIRST AMENDED CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE		
Case	Date Filed	
05-CA-305279	1/11/23	

#### INSTRUCTIONS:

1 FMPI	OYER AGAINST WHOM CHARGE IS BROUGHT	·y.
a. Name of Employer Keolis Transit Services, LLC, Keolis Transit America, Inc., and Keolis America, Inc., a single employer		b. Tel. No. (310) 703-2226 c. Cell No.
		f. Fax. No.
d. Address (Street, city, state, and ZIP code) 42031 Loudoun Center Place, Leesburg VA 20175	e. Employer Representative (b) (6), (b) (7)(C)	g. e-mail (b) (6), (b) (7)(C)@KeolisNA.com
Headquarters: 53 State St., 11th Floor, Boston MA 02109		h. Number of workers employed 120
i. Type of Establishment (factory, mine, wholesaler, etc.) Passenger Transportation	j. Identify principal product or service Public Transportation	
The above-named employer has engaged in and is engage	ging in unfair labor practices within the meaning of section	8(a), subsections (1) and
(list subsections) (5)		elations Act, and these unfair labor
practices are practices affecting commerce within the mea		,
meaning of the Act and the Postal Reorganization Act.	<b>3</b>	<b>3</b>
Basis of the Charge (set forth a clear and concise state	ament of the facts constituting the alleged unfair labor prac-	eticos)
3. Full name of party filing charge (if labor organization, g. Amalgamated Transit Union Local 689	ive full name, including local name and number)	
4a. Address (Street and number, city, state, and ZIP code 2701 Whitney Place,	9)	4b. Tel. No. (301) 669-8620
Forestville, MD 20747-3457		4c. Cell No.
		4d. Fax No. (301) 568-0692 4e. e-mail
		rjackson@atu689.org
5. Full name of national or international labor organization Amalgamated Transit Union, AFL-CIO/CLC	n of which it is an affiliate or constituent unit (to be filled in v	when charge is filed by a labor organization)
I declare that I have read the abo	ARATION ve charge and that the statements ny knowledge and belief.	Tel. No.
/s/Christopher Bangs	Christopher Bangs, ATU Assoc Gen Counsel	Office, if any, Cell No. (202) 262-2630
(signature of representative or person making charge)	(Print/type name and title or office, if any)	Fax No.
Address 10000 New Hampshire Ave, Silver Sprin	g MD 20903 Date 01/11/2023	e-mail cbangs@atu.org

#### WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

#### 2. Basis of the Charge

- 1. Since around May 9, 2022, the Employer has violated Sections 8(a)(5) and (1) by discontinuing its regular practice of periodically having employees bid on work assignments by seniority.
- 2. Since around August 25, 2022, the Employer violated Sections 8(a)(5) and (1) by refusing to provide the Union with relevant information on request about the Employer's retirement benefits.
- 3. In the last six months, the Employer violated Sections 8(a)(5) and (1) by unilaterally changing employees' retirement benefits without giving the Union notice and an opportunity to bargain.
- 4. In the last six months, the Employer has violated Sections 8(a)(5) and (1) by hiring new employees into the unit on preferential terms of employment, including better shifts, more hours, and higher wages, without giving the Union notice and an opportunity to bargain.

#### UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE		
Case	Date Filed	
05-CA-305279	1/17/23	

#### INSTRUCTIONS:

File an original with NLRB Regional Director for the region in  1 FMPI	which the alleged unfair labor practice occurred or is occurrii OYER AGAINST WHOM CHARGE IS BROUGHT	ng.
	OTEN AGAINST WHOM CHANGE IS BROOGHT	b. Tel. No.
a. Name of Employer Keolis Transit Services, LLC		(310) 703-2226
		c. Cell No.
		f. Fax. No.
d. Address (Street, city, state, and ZIP code) 42031 Loudoun Center Place, Leesburg VA 20175	(b) (6), (b) (7)(C)	a. e-mail (b) (6), (b) (7)(C)@KeolisNA.com
		h. Number of workers employed 120
i. Type of Establishment (factory, mine, wholesaler, etc.) Passenger Transportation	j. Identify principal product or service Public Transportation	
The above-named employer has engaged in and is engage	ing in unfair labor practices within the meaning of section	8(a), subsections (1) and
(list subsections) (5)		elations Act, and these unfair labor
practices are practices affecting commerce within the mea	aning of the Act, or these unfair labor practices are practic	es affecting commerce within the
meaning of the Act and the Postal Reorganization Act.		J
2. Basis of the Charge (set forth a clear and concise state See attachment.  3. Full name of party filing charge (if labor organization, gramalgamated Transit Union Local 689  4a. Address (Street and number, city, state, and ZIP code 2701 Whitney Place.	ive full name, including local name and number)	4b. Tel. No.
2701 Whitney Place, Forestville, MD 20747-3457		(301) 669-8620 4c. Cell No.
		4d. Fax No. (301) 568-0692 4e. e-mail rjackson@atu689.org
5. Full name of national or international labor organization Amalgamated Transit Union, AFL-CIO/CLC	n of which it is an affiliate or constituent unit (to be filled in w	J 0 0
I declare that I have read the abo	ARATION ve charge and that the statements ny knowledge and belief.	Tel. No.
/s/Christopher Bangs	Christopher Bangs, ATU Assoc Gen Counsel	Office, if any, Cell No. (202) 262-2630
(signature of representative or person making charge)	(Print/type name and title or office, if any)	Fax No.
Address 10000 New Hampshire Ave, Silver Spring	g MD 20903 Date	e-mail cbangs@atu.org

#### WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

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#### **Second Amended Charge Attachment**

#### 2. Basis of the Charge

- 1. Since around May 9, 2022, the Employer has violated Sections 8(a)(5) and (1) by discontinuing its regular practice of periodically having employees bid on work assignments by seniority.
- 2. Since around August 25, 2022, the Employer violated Sections 8(a)(5) and (1) by refusing to provide the Union with relevant information on request about the Employer's retirement benefits.
- 3. In the last six months, the Employer violated Sections 8(a)(5) and (1) by unilaterally changing employees' retirement benefits without giving the Union notice and an opportunity to bargain.
- 4. In the last six months, the Employer has violated Sections 8(a)(5) and (1) by hiring new employees into the unit on preferential terms of employment, including better shifts, more hours, and higher wages, without giving the Union notice and an opportunity to bargain.
- 5. In the last six months, the Employer has made unilateral changes by unilaterally announcing a new bid to reassign employees' work assignments, then unilaterally delaying the start of new work assignments, without giving the Union notice and an opportunity to bargain.

# UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE		
Case		Date Filed
	O5-CA-3O5828	10/51/55

INSTRUCTIONS:

File an original with NLRB F	Regional Director for the region in w	hich the alleged unfair labor	practice occurred or is occurring.

1 FMPI	OYER AGAINST WHOM CHARGE IS BROUGHT	-9-
	COLER AGAINST WHOM CHARGE IS BROOGHT	L Tal Na
a. Name of Employer Keolis Transit Services, LLC		b. Tel. No. (310) 703-2226
		c. Cell No. 571-919-9122
		f. Fax. No.
d. Address (Street, city, state, and ZIP code) 42031 Loudoun Center Place Leesburg, Virginia 20175	e. Employer Representative (b) (6), (b) (7)(C)	(b) (6), (b) (7)(C) <sub>2</sub> KeolisNA.com
		h. Number of workers employed 120
i. Type of Establishment (factory, mine, wholesaler, etc.) Transportation	j. Identify principal product or service Passenger Transportation	
The above-named employer has engaged in and is engaged	ging in unfair labor practices within the meaning of section	8(a), subsections (1) and
(list subsections) (3) and (5)	of the National Labor R	elations Act, and these unfair labor
	aning of the Act, or these unfair labor practices are practic	-
meaning of the Act and the Postal Reorganization Act.	,	<b>3</b>
	ement of the facts constituting the alleged unfair labor prac	ntines)
2. Dasis of the offarge (set forth a clear and concise state	ement of the facts constituting the alleged unial labor prac-	onces)
	could enter the facility and threatening that "If more remain outside." The Employer neither owns nor h	
3. Full name of party filing charge (if labor organization, g Amalgamated Transit Union Local 689	ive full name, including local name and number)	
4a. Address (Street and number, city, state, and ZIP code 2701 Whitney Place,	9)	4b. Tel. No. (301) 669-8620
Forestville, MD 20747-3457		4c. Cell No.
		4d. Fax No. (301) 568-0692
		4e. e-mail rjackson@atu689.org
5. Full name of national or international labor organization Amalgamated Transit Union, AFL-CIO/CLC	n of which it is an affiliate or constituent unit (to be filled in t	when charge is filed by a labor organization)
I declare that I have read the abo	ARATION we charge and that the statements by knowledge and belief.	Tel. No.
/s/Christopher Bangs	Christopher Bangs, ATU Assoc Gen Counsel	Office, if any, Cell No. (202) 262-2630
(signature of representative or person making charge)	(Print/type name and title or office, if any)	Fax No.
Address 10000 New Hampshire Ave, Silver Sprin	g MD 20903 Date Oct 21, 2022	e-mail cbangs@atu.org

### WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

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#### UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

**CHARGE AGAINST EMPLOYER** FIRST AMENDED

DO NOT WRITE IN THIS SPACE		
Case	Date Filed	
05-CA-305828	01-11-2023	

#### INSTRUCTIONS:

File an original with NLRB Regional Director for the region in	which the alleged unfair labor practice occurred or is occurri	ıg.
1. EMPL	OYER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Employer Keolis Transit Services, LLC, Keolis Transit America, Inc., and Keolis America, Inc.,		b. Tel. No. (310) 703-2226
a single employer		c. Cell No.
		571-919-9122
		f. Fax. No.
d Address (Street site state and 7/D code)	a Employer Penragantativa	_
d. Address (Street, city, state, and ZIP code) 42031 Loudoun Center Place Leesburg, Virginia 20175	e Employer Representative (b) (6), (b) (7)(C)	(b) (6), (b) (7)(C) @KeolisNA.com
Headquarters:		
53 State St., 11th Floor, Boston MA 02109		h. Number of workers employed 120
i. Type of Establishment (factory, mine, wholesaler, etc.) Transportation	j. Identify principal product or service Passenger Transportation	
The above-named employer has engaged in and is engage	ging in unfair labor practices within the meaning of section	8(a), subsections (1) and
(list subsections) (3) and (5)	of the National Labor R	elations Act, and these unfair labor
practices are practices affecting commerce within the mea	aning of the Act, or these unfair labor practices are practic	es affecting commerce within the
meaning of the Act and the Postal Reorganization Act.		
Basis of the Charge (set forth a clear and concise state)	ement of the facts constituting the alleged unfair labor prac-	ctices)
On or around October 20, 2022, the Employer thro limiting the number of Union representatives who facility, I will refuse them access and ask them to r	could enter the facility and threatening that "If mor	
3. Full name of party filing charge (if labor organization, gamma Amalgamated Transit Union Local 689	ive full name, including local name and number)	
4a. Address (Street and number, city, state, and ZIP code 2701 Whitney Place,	9)	4b. Tel. No. (301) 669-8620
Forestville, MD 20747-3457		4c. Cell No.
		4d. Fax No.
		(301) 568-0692
		4e. e-mail rjackson@atu689.org
Full name of national or international labor organization	of which it is an affiliate or constituent unit (to be filled in v	when charge is filed by a labor organization)
Amalgamated Transit Union, AFL-CIO/CLC		men analge is med by a label elgamization,
6 DECL	ARATION	Tel. No.
I declare that I have read the abo	ve charge and that the statements by knowledge and belief.	
/s/Christopher Bangs	Christopher Bangs, ATU Assoc Gen Counsel	Office, if any, Cell No. (202) 262-2630
(signature of representative or person making charge)	(Print/type name and title or office, if any)	Fax No.
Address 10000 New Hampshire Ave, Silver Spring	g MD 20903 Date 01/11/2023	e-mail cbangs@atu.org

#### WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

#### UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD **CHARGE AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE			
Case		Date Filed	
	05-CA-307561	11/17/21	

#### INSTRUCTIONS:

File an original with NLRB Regional Director for the region in  1 FMPI	which the alleged unfair labor practice occurred or is occurri OYER AGAINST WHOM CHARGE IS BROUGHT	ng.
a. Name of Employer	OTEN NO MINOR OF MINOR OF MINOR OF DINOCOTT	b Tel No
Keolis Transit Services, LLC		(310) 703-2226
110010 1101101 501 11003, 225		(610) / 66 222
		c. Cell No.
		571-919-9122
		f. Fax. No.
d. Address (Street, city, state, and ZIP code)	(b) (6), (b) (7)(C) esentative	
42031 Loudoun Center Place	(b) (0), (b) (1)(C)	(b) (6), (b) (7)(C) @KeolisNA.com
Leesburg, Virginia 20175		(b) (c), (c) (c) (d) (d) (d) ReolistvA.com
		h. Number of workers employed
		120
i. Type of Establishment (factory, mine, wholesaler, etc.)	j. Identify principal product or service	
Transportation	Passenger Transportation	
The above-named employer has engaged in and is engaged		
(list subsections) (5)	of the National Labor R	Relations Act, and these unfair labor
practices are practices affecting commerce within the mea	aning of the Act, or these unfair labor practices are practic	ces affecting commerce within the
meaning of the Act and the Postal Reorganization Act.		
Basis of the Charge (set forth a clear and concise state)	ament of the facts constituting the alleged unfair labor prac-	eticas)
See attachment.	iment of the facts constituting the alleged unital labor prac-	Juces)
2. Full name of party filing sharge (if labor argenization of	ive full name, including level name and number	
3. Full name of party filing charge (if labor organization, g Amalgamated Transit Union Local 689	ive ruii name, including local name and number)	
Amargamated Transit Onion Local 009		
4a. Address (Street and number, city, state, and ZIP code	e)	4b. Tel. No.
2701 Whitney Place,		(301) 669-8620
Forestville, MD 20747-3457		4c. Cell No.
		4C. Cell No.
		4d. Fax No.
		(301) 568-0692
		4e. e-mail
		rjackson@atu689.org
		ijackson@atuoo5.org
5. Full name of national or international labor organization	n of which it is an affiliate or constituent unit (to be filled in v	when charge is filed by a labor organization)
Amalgamated Transit Union, AFL-CIO/CLC		
6 DECL	ARATION	Tel. No.
	ve charge and that the statements	
	ny knowledge and belief.	05. 7. 0.1111
/s/Christopher Bangs	Christopher Bangs, ATU Assoc Gen Counsel	Office, if any, Cell No.
(signature of representative or person making charge)		(202) 262-2630
	(Print/type name and title or office, if any)	
		(202) 262-2630
		(202) 262-2630 Fax No.
Address 10000 New Hampshire Ave, Silver Sprin	(Print/type name and title or office, if any)	(202) 262-2630

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary, however, failure to supply the information may cause the NLRB to decline to invoke its processes.

2.	<b>Basis</b>	of	the	Charge

- 1. For the last six months including during bargaining on November 17, 2022, Keolis through its (b) (6), (b) (7)(C) has violated Sections 8(a)(5) and (1) by failing and refusing to bargain in good faith with the Union.
- 2. On November 17, 2022, Keolis through (b) (6), (b) (7)(C) violated Section 8(a)(1) by calling a Union employee a (b) (6), (b) (7)(C) slur during bargaining.

### UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

FIRST AMENDED CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE				
Case	Date Filed			
05-CA-307561	01/11/2023			

#### INSTRUCTIONS:

File an original with NLRB Regional Director for the region in	which the alleged unfair labor practice occurred or is occurrin	g.
1. EMPL	OYER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Employer Keolis Transit Services, LLC , Keolis Transit America, Inc., and Keolis America, Inc., a single employer		b. Tel. No. (310) 703-2226
		c. Cell No. 571-919-9122
		f. Fax. No.
d. Address (Street, city, state, and ZIP code) 42031 Loudoun Center Place Leesburg, Virginia 20175	(b) (6), (b) (7)(C) esentative	(b) (6), (b) (7)(C) @KeolisNA.com
Headquarters: 53 State St., 11th Floor, Boston MA 02109		h. Number of workers employed 120
i. Type of Establishment (factory, mine, wholesaler, etc.) Transportation	j. Identify principal product or service Passenger Transportation	
The above-named employer has engaged in and is engage	jing in unfair labor practices within the meaning of section	8(a), subsections (1) and
(list subsections) (5)	of the National Labor Re	elations Act, and these unfair labor
practices are practices affecting commerce within the mea	aning of the Act, or these unfair labor practices are practice	es affecting commerce within the
meaning of the Act and the Postal Reorganization Act.		
3. Full name of party filing charge (if labor organization, gramalgamated Transit Union Local 689  4a. Address (Street and number, city, state, and ZIP code 2701 Whitney Place,		4b. Tel. No. (301) 669-8620
Forestville, MD 20747-3457		4c. Cell No.
		4d. Fax No. (301) 568-0692  4e. e-mail
		rjackson@atu689.org
5. Full name of national or international labor organization Amalgamated Transit Union, AFL-CIO/CLC	of which it is an affiliate or constituent unit (to be filled in w	hen charge is filed by a labor organization)
DECLARATION  I declare that I have read the above charge and that the statements     are true to the best of my knowledge and belief.		Tel. No.
/s/Christopher Bangs	Christopher Bangs, ATU Assoc Gen Counsel	Office, if any, Cell No. (202) 262-2630
(signature of representative or person making charge)	(Print/type name and title or office, if any)	Fax No.
Address 10000 New Hampshire Ave, Silver Spring	g MD 20903 Date 01/11/2023	e-mail cbangs@atu.org

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